

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUDGE LYNDI

UNITED STATES OF AMERICA

:

INFORMATION

- v. -

:

07 Cr.

SAADI AHMAD

:

Defendant.

:

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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APR 18 2007

COUNT ONE

(Conspiracy To Bribe a Public Official)

07 CRIM

324

The United States Attorney charges:

1. From in or about May 2005 through in or about December 2006, in the Southern District of New York and elsewhere, SAADI AHMAD, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, bribing a public official in violation of Title 18, United States Code, Section 201(b)(1).

2. It was a part and object of the conspiracy that SAADI AHMAD, the defendant, and others known and unknown would and did, directly and indirectly, corruptly give, offer and promise things of value to a public official to influence an official act, and to influence such public official to commit and aid in committing, and collude in, and allow, a fraud, and make opportunity for the commission of a fraud, on the United States,

and to induce such public official to do and omit to do an act in violation of the lawful duty of such official, in violation of Title 18, United States Code, Section 201(b)(1).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about May 9, 2005, SAADI AHMAD, the defendant, introduced to a co-conspirator not named herein as a defendant ("CC-1") to an undercover agent with Immigration and Customs Enforcement ("UC-1"), who was posing as an individual who had the ability corruptly to cause goods to clear through United States Customs and Border Protection ("Customs"), so that CC-1 could pay UC-1 for assistance in clearing counterfeit clothing through Customs.

b. On or about July 13, 2006, AHMAD introduced UC-1 to two co-conspirators not named herein as defendants ("CC-2" and "CC-3") so that CC-2 and CC-3 could pay UC-1 for assistance in clearing counterfeit clothing through Customs.

(Title 18, United States Code, Section 371.)

COUNT TWO

The United States Attorney further charges:

4. From in or about 2005 through in or about December 2006, in the Southern District of New York and elsewhere, SAADI

AHMAD, the defendant, unlawfully, willfully, knowingly and intentionally trafficked and attempted to traffic in goods and knowingly used a counterfeit mark on and in connection with such goods, to wit, the defendant trafficked, and attempted to traffic, in clothes bearing the counterfeit trademarks of "Akademiks," "Apple Bottoms," and "Phat Farm," among others.

(Title 18, United State Code, Sections 2320(a) and 2.)



MICHAEL J. GARCIA *MAA*
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(Title 18, United States Code,
Sections 371, 201(b)(1), and 2)

MICHAEL J. GARCIA
United States Attorney.
